

Worksheet for Technical Review of Working Draft of Proposed Permit

Company Name:	PPG Industries, Inc.	AI #:	1255	TEMPO Activity No:	PER200900024
Facility Name:	Greater EDC Unit	Remarks Submitted by:	Andrew Watson, Don Johnson, PPG Industries, Inc.		
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Instructions

Permit Reference – Indicate specific portion(s) of the permit to which the remark relates (i.e. “Specific Condition 120”, or “Section II Air Permits Briefing Sheet”, etc.).

Remarks – Explain the basis for each remark. Provide regulatory citations where possible. If the remark is made due to an error or omission in the permit application this must be noted and the revised information **must be submitted**. Revised information may be submitted separately from this worksheet. Please be aware that revised information must be submitted in writing and certified by the Responsible Official, and if necessary, by a Professional Engineer licensed in Louisiana. *Please Note*: New or additional equipment, processes or operating conditions not addressed in the original permit application will be addressed on a case-by-case basis. The Department reserves the right to address such changes in a separate permit action.

DEQ Response – **DO NOT COMPLETE THIS SECTION.** This section will be completed by Air Permits Division of DEQ, included in the proposed permit package and made available for public review during any required public comment period.

- Additional rows may be added as necessary.
 - Completed Form shall be emailed to the Permit writer in MS Word compatible format within the deadline specified in the email notification.
- DO NOT USE THIS FORM TO SUBMIT COMMENTS DURING THE OFFICIAL PUBLIC COMMENT PERIOD.***

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Statement of Basis IV Facility Background and Current Permit Status Page 3	The PSD permit number listed (PSD -LA-642 (11/23/1999)) does not apply to this facility. Please reference the PSD permit that does apply: PSD-LA-520(M1) 8/27/86.	This section list all active air emission related permits for the Lake Charles Complex.
Statement of Basis XII Permit Shield Page 13	Not all of the determinations related to the request for a permit shield are reflected in Table 2: AAE section 9 items: 2, 4, 5, 6, 8, 9, and 10. Comments on each of these are included below, for Table 2.	Please add the following obligation that has been satisfied. 1. The initial HON notification [40 CFR 63.151(b)]
Statement of Basis XV Page 14		The Section XV has been updated to indicate that the initial notification requirements of 40 CFR 63.151(b) have been satisfied. The initial HON notification requirements have been removed from the permit. The request to remove this specific condition referencing this requirement is included below.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit ID No. EQT 0542 562A – EDC Portable Carbon Drum Control CD 1 – 10 for the following requirements: Exemption Status or Non-Applicability of a Source Page 16	Subpart F - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry Subpart G - National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry for Process Vents, Storage Vessels, Transfer Operations, and Wastewater Requirement HON Subpart H – National Emission Standards for Organic Hazardous Air Pollutants for Equipment Leaks [40 CFR 63.160] Notes: The source will be in service <300 hours/year and is exempt from the above requirements, per 63.100(f)(11) and 63.160(a).	According to the application, this portable device will be used as an alternate control device “to control emissions from HON Group 1 and 2 storage vessels, surge control vessels, bottoms receivers, and other non-HON vents during maintenance events in which the vent header to the incinerators or Halogen Acid Furnace (HAF) must be taken out of service for repairs”. Therefore, it shall meet HON requirements for control devices.
Permit Table 2 Explanation for Exemption for Exemption Status or Non-Applicability of a Source Page 16	Please add the following entry into Table 2 for UNF010. Requirement: NESHAP Subpart NNNNN – HCL Production [40 CFR 63.8985]. Notes: Does not apply – The whole EDC operating unit (as well as all ancillary equipment) is not subject to NESHAP Subpart NNNNN as no liquid product at a concentration of 30% by weight or greater is produced at the facility.	This subpart is to regulate the HCl production facilities and it has been addressed in the draft for all emission sources associated with HCl production in the Greater EDC Unit.
Permit Table 2 Explanation for Exemption for Exemption Status or Non-Applicability of a Source Page 17	Please revise the designation of EQT 532 to EQT 534, in the identification of sources not subject to NESHAP Subpart NNNNN as EQT532 and EQT 533 were removed from the permit as part of this renewal.	Correction has been made as requested.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Table 2 Explanation for Exemption for Exemption Status or Non-Applicability of a Source Page 16	<p>Please add the following entry to Table 2 for EQTs 487 through EQT 490.</p> <p>Requirement HON Subpart F – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry[40 CFR 63.100]</p> <p>Notes: Does not apply – The sources are used for startup, shutdown and malfunction only.</p>	<p>No specific requirements in HON Subpart F are for the sources indicated here (EQT487 through EQT490), even they are not used for startup, shutdown and malfunction only.</p>
Permit Table 2 Explanation for Exemption for Exemption Status or Non-Applicability of a Source Page 16	<p>Please add the following entry to Table 2:</p> <p>ID No.: EQTs 487 through EQT 490 and EQT 493 & 494.</p> <p>Requirement: 40 CFR 64 – Compliance Assurance Monitoring</p> <p>Notes: Does Not Apply – Pre-control emissions are less than the quantity needed to be classified as a major source for all emissions emitted by these sources.</p>	<p>On CAM requirements, the permit only addresses the emission units with pre-control emissions equal to or greater than the quantity required for a source to be classified as a major source.</p>
Permit Table 2 Explanation for Exemption for Exemption Status or Non-Applicability of a Source Page 16	<p>Please add the following entry to Table 2 for EQTs 491, 493, 494, 534, 535, 536, and 537.</p> <p>Requirement: HON Subpart F – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry[40 CFR 63.100]</p> <p>Notes: Does not apply – Not part of a HON CMPU.</p>	<p>Table 2 already indicated that these emission sources are not part of a HON CMPU. The cited regulation has been changed to HON Subpart F instead of HON Subpart G.</p>
Permit Table 2 Explanation for Exemption for Exemption Status or Non-Applicability of a Source Page 16	<p>Please add to Table 2 a designation of 3 for RLP 377 through RLP387.</p> <p>These sources are not subject to Requirement HON Subpart F – National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry[40 CFR 63.100].</p> <p>Notes: Does not apply - These vents route back to a process so are considered in-process streams and don't meet the definition of a process vent.</p>	<p>Table 2 already indicated that these vents are routed back to process. The cited regulation has been changed to HON Subpart F instead of HON Subpart G.</p>

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Specific Requirement 8 Page 1 of 9	SR 8 Initial notification has been made. The specific requirement should be deleted. Please include in the Statement of Basis, a statement that the required initial notification has already been made.	This initial notification has been made by the facility and corresponding specific requirement has been removed from the permit.
Permit Specific Requirement SR 22 Page 2 of 9	SR 22 The process vent standards of 63.113 can be achieved by compliance with either 63.113(a)(1) or 63.113(a)(2). PPG complies with the requirements of 63.113(a)(1). Please change SR 22 to reference verbiage and the citation to 40 CFR 63.113(c)(1).	The facility can comply with 40 CFR 63.113(c)(1) or c(2). As requested, the option (c)(1) has been selected. Note that the facility complies with (a)(2) option (non-flare control devices), not (a)(1) option (flare).
Permit Specific Requirement 13 Page 2 of 9	SR 13 Please change the citation to LAC 33:III.2103.A and add the following language to the beginning of the requirement: "For EQTs 497, 498 & 499, equip with a submerged fill pipe or a vapor loss control system, as defined in 2103.E."	For clarity, the members in CRG0008 have been rearranged into two groups: one is subject to LAC 33:III.2103.A and the other is subject to 2103.B. The requirements for each group are revised accordingly.
Permit Specific Requirement 14 Page 2 of 9	SR 14 Please add the following to the end of the first sentence in this requirement: "...for sources subject to LAC 33:III.2103.B."	For clarity, the members in CRG0008 have been rearranged into two groups: one is subject to LAC 33:III.2103.A and the other is subject to 2103.B. The requirements for each group are revised accordingly.
Permit Specific Requirements Page 3 of 9	Please correct the typographical error in the name of EQT 0493 373 – North Rubber Lined Acid Storage Tank.	The typo has been corrected.
Permit Specific Requirements Page 3 of 9	Please add a specific requirement for CRG 0014 and CRG 0015 for LAC 33:III.2103.I Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1-7, as applicable.	The specific requirement has been added as requested.
Permit Specific Requirements 42 Page 5 of 9	SR 42 through 46 Please delete these requirements. The use of Portable Carbon Drums will not include control of any process vents. Therefore, the referenced regulations for specific requirements are not applicable to EQT0542. In addition the control device will be in service for <300 hr/yr and is therefore not subject to HON. [40 CFR 63.100(f)(1) & 63.160(a)]	According to the application, this portable device will be used as an alternate control device "to control emissions from HON Group 1 and 2 storage vessels, surge control vessels, bottoms receivers, and other non-HON vents during maintenance events in which the vent header to the incinerators or Halogen Acid Furnace (HAF) must be taken out of service for repairs", it shall meet HON requirements for control devices.

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Specific Requirements 47 through 52 Page 5 of 9	SR 47 through 52. Please delete these requirements. The control device will be in service for <300 hr/yr and HON is not applicable [40 CFR 63.100(f)(11) & 63.160(a)]	See response above.
Permit Specific Requirements 53 through 61 Page 5 of 9	SR 53 through 61 Please delete these requirements. The use of Portable Carbon Drums will not include hard piping or ductwork. Therefore, the referenced regulations for these specific requirements are not applicable to EQT0542.	The hard piping or ductwork will not be used with the Portable Carbon Drums. Therefore, the specific requirements for hard piping or ductwork have been removed.
Permit Specific Requirement 63 Page 5 of 9	In addition the control device will be in service for <300 hr/yr and is therefore not subject to HON. [40 CFR 63.100(f)(11) & 63.160(a)]	As addressed above, this source is subject to HON Subpart G.
Permit Specific Requirements 72 through 93 Page 6 & 7 of 9	SR 63 If SR 42 through 61 are removed, please revise the requirement to, "Use of carbon adsorption, with a VOC control efficiency of >95%, has been determined to be compliance with MACT in accordance with LAC33:III.5109 A.1."	As stated in numerous correspondences with PPG, LDEQ's position is that, where a facility is operating under multiple Title V permits, 40 CFR 68 requirements are to be placed in each unit's permit where such requirements are applicable.
Permit Specific Requirement 69 Page 7 of 9	SR 72 – 93 Please delete SR 73 through 93 and revise SR 72 to read "The Greater EDC Unit is part of a site (Lake Charles Complex) that is subject to the requirements of 40 CFR 68. The requirements for 40 CFR Part 68 can be found in the latest revision of PPG's Complex Support Title V permit (currently 2359-V2)."	This comment will be considered in next TEMPO standard requirement revision.
Permit Specific Requirement 71 Page 7 of 9	SR 69 Please revise wording to read, " All affected facilities, as defined in 40 CFR part 61, shall comply with all applicable provisions in 40 CFR 61 Subpart A."	This comment will be considered in next TEMPO standard requirement revision.
Permit Specific Requirement 97 Page 8 of 9	SR 71 Please revise wording to read " All affected facilities, as defined in 40 CFR part 63, shall comply with all applicable provisions in 40 CFR 63 Subpart A."	This is a unit-wide requirement.
Permit Specific Requirement 101 Page 8 of 9	SR 97 Please move this requirement to EQT 0491. EQT 491 is the only source that requires recordkeeping to demonstrate the exemption to LAC 33.III.2115. No other sources in the Greater EDC Unit are subject to the recordkeeping requirements of Las 33.III.2115 and the requirement doesn't apply to the operating unit as a whole.	This is an HCl production limit for the Greater EDC Unit. Thus, this specific requirement is put under this unit (UNF0010).

Permit Reference	Remarks	Air Permits Division Response (for official use only)
Permit Inventories Page 2 of 5	Please correct the operating time for EQT 0542 to <300 hr/yr.	TEMPO does not have “<” (less than) option for annual operating hours.